Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of)
)
Amendment of Section 90.20 and 90.175 of the) WT Docket 02-285
Commission's Rules for Frequency Coordination) RM-10077
Of Public Safety Frequencies in the Private Land)
Mobile Radio Below 470 MHz Band)

To: The Commission

REQUEST FOR EXTENSION OF TIME TO FILE REPLY COMMENTS

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby requests that the Commission extend the period for filing reply comments in the above-captioned proceeding, which was initiated in response to APCO's Petition for Rulemaking. The current due date is December 20, 2002, just 15 days following submission of initial comments. APCO requests that the reply comment period be extended until January 10, 2003.

The current reply comment period does not allow adequate time for careful review of initial comments and development of comprehensive responses that would assist the Commission in this proceeding. APCO and other organizations involved in this proceeding are also actively involved in several other critical matters before the Commission, further restricting available time and resources. A brief extension of the reply comment deadline (*e.g.*, 14 days) would be of little benefit, as it would extend the comment period into the upcoming holiday period. APCO and other parties in this proceeding depend upon the time and resources of their volunteer members, many of whom will be traveling or otherwise unavailable from December 20 until after New Years' Day (as will the undersigned counsel).

Counsel for the American Association of State Highway Transportation Officials and International Association of Fire Chiefs, Inc./International Municipal Signal Association has informed the undersigned that they do not object this request for additional time, and counsel for Forestry Conservation Communications Association had previously informed the undersigned of its support for a time extension.

Therefore, for the reasons discussed above, APCO requests that the Commission allow reply comments to be filed on or before January 10, 2003.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC.

By:

Robert M. Gurss SHOOK, HARDY & BACON, LLP 600 14th Street, N.W., Suite 800 Washington, DC 20005 (202) 662-4856

December 9, 2002